

# Sage Legal LLC

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April 20, 2025

## VIA ECF

United States District Court  
Eastern District of New York  
Attn: Hon. James R. Cho, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 11D South  
Brooklyn, NY 11201-1804

**Re: IME WatchDog, Inc. v. Gelardi, et al.**  
**Case No.: 1:22-cv-1032 (PKC) (JRC)**

Dear Judge Cho:

This office, along with Milman Labuda Law Group PLLC, represents the Plaintiff IME WatchDog, Inc. ("Plaintiff") in the above-referenced case. Plaintiff writes to respectfully request an extension of time *sine die* of the deadline to provide a joint status report concerning the status of discovery pending the motion by counsel for Defendants Safa Abdulrahman Gelardi, Vito Gelardi, and IME Companions LLC to withdraw as counsel.

Pursuant to § C(1) of this Court's Individual Practices, Plaintiff respectfully submits that: (1) the deadline Plaintiff seeks to extend falls on April 21, 2025; (2-3) there have been no previous requests for an extension of this deadline by any party; (4) Plaintiff did not seek Defendants' consent due to the pending Order to show cause to withdraw as counsel (ECF Docket Entry [464](#)); and (5) Plaintiff does not believe that this request affects any other scheduled Court appearance or deadline.

Based on the foregoing, Plaintiff respectfully submits that sufficient good cause exists for this Court to exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A).

Dated: Lake Success, New York  
April 20, 2025

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**  
/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York  
April 20, 2025

**SAGE LEGAL LLC**  
/s/ Emanuel Kataev, Esq.

cc: all Counsel of Record (via ECF)